

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF ILLINOIS**

IN THE MATTER OF:)	
)	Case No. 21-40413
JORDAN LOYDE SAYGE,)	
)	Chapter 13
Debtor.)	
-----)	

**CREDITOR LYNDON SOUTHERN INSURANCE OBJECTION TO DEBOTOR'S
AMENDED PLAN**

Comes Now Lyndon Southern Insurance ("Lyndon"), secured creditor in the above-styled case, by and through its attorney, and for its Objection to Debtor's Third Amended Plan states as follows:

1. Debtor filed his Third Amended Plan on February 4th, 2022 ("Plan") and objections are due 21 days thereafter.

2. Pursuant to the Plan, Debtor values the collateral securing Lyndon's claim at \$25,000.00 (2016 Keystone RV) and \$48,000.00 (2017 Ford F-250) (collectively "Collateral").

3. Debtor's Plan proposes to pay Evansville Teachers Credit Union based upon the aforementioned valuations.

4. Evansville Teachers Credit Union is not the secured creditor of these claims as these claims were assigned to Lyndon on January 14, 2022 [DE 44]. Accordingly, Debtor's Plan is inaccurate with respect to payment of these secured claims.

5. Further, Debtor's valuation of the Collateral is way understated as a used 2016 Keystone is at least valued at \$45,000.00 and a used 2017 Ford F-250 is valued between \$53,000.00-\$70,000.00 depending upon mileage. Based upon accurate valuations, Debtor would need to make significantly larger payments in his plan and therefore Lyndon is not adequately protected under the Plan.

6. Accordingly, Debtor's Plan does not conform with 11 USC §§ 1325 (5) and (6).

WHEREFORE, Lyndon Southern Insurance prays that its objection be sustained, that Debtor's third amended plan not be confirmed and for such other and further relief as this Court deems just and proper.

Dated: February 7, 2022

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, P.C.

By: /s/ Randall F. Scherck
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Attorney Creditor Lyndon Southern Insurance

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day February, 2022, a true and accurate copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties receiving electronic notice.

/s/ Randall F. Scherck

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